

Isabel C. Balboa, Chapter 13 Standing Trustee†

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September 3, 2020

The Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court
P.O. Box 2067
Camden, New Jersey 08102

RE: Chapter 13 Bankruptcy
Debtor(s) Name: Salvatore M. Campo
Case No: 19-32625 JNP

Dear Judge Poslusny:

Please accept this letter in lieu of a more formal response and in opposition to Debtor's Motion to Vacate Dismissal Order, which is returnable September 15, 2020 at 11:00 a.m.

Debtor filed for Chapter 13 Bankruptcy protection on December 3, 2019. Debtor's plan proposed to pay \$210 per month for thirty-six (36) months commencing January 1, 2020, to pay administration fees of \$4,750 and 100% to the unsecured creditors who timely filed a proof of claim. The Court entered an Order Confirming Debtor's plan on May 6, 2020, for \$210 for thirty-six (36) months.

Debtor's Certification states that payment was submitted to bring case current. A plan payment was posted to Debtor's case on August 21, 2020 for \$1,050. However, on August 25, 2020, the payment was returned insufficient. A plan payment was also received on July 23, 2020, and also return insufficient on July 28, 2020. The last payment posted to Debtor's case was on March 13, 2020.

Debtor has submitted three (3) out of eight (8) plan payments and is \$1,050 in arrears. By the return date of this motion, another plan payment will be due, increasing the arrears to \$1,260.

The Trustee respectfully requests if the Court grants Debtor's motion, the Debtor be required to submit an amended Order to the Judge's chamber to include the following language:

1. Debtor shall forward \$1,260 to the Chapter 13 Trustee within ten (10) days of the date of this Order;
2. Should Debtor fail to comply with the terms of this Order, Debtor's case shall be dismissed upon the receipt of certification by the Trustee of such non-compliance filed with the Court and served upon Debtor.

As always, please feel free to contact this office with any questions or concerns.

Respectfully submitted,

/s/ Jane L. McDonald
Jane L. McDonald
Counsel for Isabel C. Balboa,
Chapter 13 Standing Trustee

ICB/kt

c: Jenkins & Clayman (via ECF/CM)
Salvatore M. Campo (via Regular Mail)